

Lennox S. Hinds, Esq. (NY Bar 8196)  
**STEVENS, HINDS & WHITE, PC**  
116 West 111<sup>th</sup> Street  
New York, NY 10026-4026  
Telephone: (212) 864-4445  
Facsimile: (212) 222-2680  
lawfirmshw@yahoo.com

*Counsel for Plaintiff Sherrie Russell-Brown*

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

-----X  
SHERRIE RUSSELL-BROWN, :  
: Civil Action No. 2:10-cv-04017-SDW-MCA  
Plaintiff, :  
v. :  
THE UNIVERSITY OF FLORIDA, : **RETURN OF SERVICE EXECUTED**  
BOARD OF TRUSTEES, :  
THE UNIVERSITY OF FLORIDA, :  
LEVIN COLLEGE OF LAW, :  
ROBERT H. JERRY, II, in his :  
individual and official capacities as :  
Dean of the University of Florida, :  
Levin College of Law, THE :  
UNIVERSITY OF OXFORD, :  
OXFORD UNIVERSITY :  
DEVELOPMENT (NORTH AMERICA), :  
INC., ALM MEDIA, LLC, WILLIAM :  
L. POLLAK and KAREN SLOAN, :  
: Defendants. :  
-----X

LENNOX S. HINDS hereby certifies and says:

1. I am a partner in the law firm of Stevens, Hinds & White, P.C., attorneys for Plaintiff Sherrie Russell-Brown in the above-captioned matter. I am personally familiar with the facts set forth herein.
2. On August 5, 2010, Ms. Russell-Brown filed a Complaint (Doc. 1) for declaratory,

injunctive and equitable relief, as well as monetary damages, to redress Defendants<sup>1</sup> unlawful conduct, including their unlawful retaliation for Ms. Russell-Brown having engaged in and continuing to engage in protected activity, in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981 (“Section 1981”), Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681 et seq. (“Title IX”), Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d et seq. (“Title VI”), and the First, Fifth and Fourteenth Amendments to the U.S. Constitution pursuant to 42 U.S.C. § 1983.

3. Service of process of the Summons and Complaint upon Defendant Oxford was effected by two methods. On August 13, 2010, service of process of the Summons and Complaint upon Oxford was effected by delivering a copy of each by UPS, signature required, directly to its executive offices in the U.K. (Doc. 4). On August 24, 2010, service of process of the Summons and Complaint upon Oxford was effected by delivering two copies of each by UPS, signature required, to CT Corporation, 1209 Orange Street, Wilmington, Delaware 19801, for directing to Oxford University Development (North America), Inc. (file # 2182294) (“Oxford NA”) and Oxford University Press (file # 0791971) (“OUP”), as agents authorized by appointment or by law to receive service of process on Oxford’s behalf (Doc. 8, ¶ 3, Exhibit A).

4. On August 31, 2010, Ms. Russell-Brown filed an Amended Complaint (Doc. 7), adding new facts as well as a new defendant, Oxford NA (collectively, with Oxford, referred to as the “Oxford Defendants”).

5. On September 2, 2010, service of process of the Summons and Amended Complaint upon Defendant Oxford NA was effected by delivering a copy of each by UPS, signature required, to CT Corporation, 1209 Orange Street, Wilmington, Delaware 19801, an agent authorized by appointment or by law to receive service of process (Doc. 8, ¶ 5, Exhibit B).

---

<sup>1</sup> Jointly and severally, the University of Florida Board of Trustees (“UF”), the University of Florida, Levin College of Law (“Levin College of Law”), Robert H. Jerry, II (“Jerry”), in his individual and official capacities as Dean of the Law School (collectively, the “Gainesville Defendants”), and the University of Oxford (“Oxford”).

6. Service of process of the Amended Complaint upon Defendant Oxford was effected by three methods. On August 31, 2010, service of process of the Amended Complaint upon Oxford was effected by electronically serving a copy to its attorneys, using the CM/ECF system. On September 2 and 3, 2010, service of process of the Amended Complaint upon Oxford was effected, respectively, by delivering two copies by UPS, signature required, to CT Corporation, 1209 Orange Street, Wilmington, Delaware 19801, for directing to Oxford NA and OUP, as agents authorized by appointment or by law to receive service of process on Oxford's behalf and by delivering a copy by UPS, signature required, directly to its executive offices in the U.K. (Doc. 8, ¶ 6, Exhibit C).

7. On September 24, 2010, Ms. Russell-Brown filed a First Amended Complaint (Doc. 20), adding new facts regarding retaliation by the Gainesville and Oxford Defendants, subsequent to the filing of the Amended Complaint, as well as new defendants, ALM Media, LLC, William L. Pollak and Karen Sloan (collectively, the "Media Defendants").

8. On September 24, 2010, service of process of the First Amended Complaint upon the Oxford Defendants was effected by electronically serving a copy to their attorneys, using the CM/ECF system.

9. By September 27, 2010, counsel for the Media Defendants was authorized to accept service and by September 29, 2010, service of process of the Summons and First Amended Complaint was effected on the Media Defendants.

10. Undersigned counsel for Ms. Russell-Brown and counsel for the Media Defendants agreed to an enlargement of time of 45 days, for the Media Defendants to respond to Ms. Russell-Brown's First Amended Complaint.

11. On November 24, 2010, in response to the Oxford and Media Defendants' Motions to Dismiss, filed October 8, October 12 and November 15, 2010 (Docs. 24, 26 and 36, respectively), Ms. Russell-Brown filed a Second Amended Complaint (Doc. 39) against all of the Defendants.

12. On November 24, 2010, service of process of the Second Amended Complaint upon the Oxford and Media Defendants (*supra* paragraphs 4 and 7) was effected by electronically serving a copy to their attorneys, using the CM/ECF system.

13. By November 30, 2010, counsel for the Gainesville Defendants (*supra* note 1), Mr. Ian Marx, Esq., was authorized to receive service on his clients' behalf and on November 30, 2010, service of process of the Summons and Second Amended Complaint was effected on the Gainesville Defendants.

14. Mr. Marx and undersigned counsel for Ms. Russell-Brown have agreed to an enlargement of time of 60 days, until January 28, 2011, for the Gainesville Defendants to respond to Ms. Russell-Brown's Second Amended Complaint.

I hereby certify and declare, under penalty of perjury, under the laws of the United States of America that the foregoing information contained in the Return of Service Executed is true and correct.

s/ Lennox S. Hinds  
Lennox S. Hinds, Esq.  
New York Bar No. 8196  
Stevens, Hinds & White, PC  
116 West 111<sup>th</sup> Street  
New York, NY 10026-4206  
(212) 864-4445  
(212) 222-2680 (fax)  
lawfirmshw@yahoo.com

Executed on: November 30, 2010  
New York, New York

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on November 30, 2010, the foregoing has been filed with the Clerk of the Court and served electronically by using the CM/ECF system, upon the following:

Zoë Eva Jasper, Esq.  
SATTERLEE STEPHENS BURKE & BURKE LLP  
33 Wood Avenue South  
Iselin, New Jersey 08830  
212-818-9200  
zjasper@ssbb.com

*Attorneys for Defendants the University of Oxford and Oxford University Development (North America), Inc.*

Bruce Rosen, Esq.  
MCCUSKER, ANSELMI, ROSEN & CARVELLI, P.C.  
210 Park Avenue, Suite 301  
P.O. Box 240  
Florham Park, New Jersey 07932  
BRosen@marc-law.com  
973-635-6300  
*Attorneys for Defendants ALM Media, LLC, William L. Pollak and Karen Sloan*

s/ Lennox S. Hinds  
Lennox S. Hinds  
Attorney for Plaintiff